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March 15, 2021

The Honorable John P. Cronan
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: J. Kleinhaus & Sons, LLC v. Valley Forge Insurance Company
Civ. A. No. 21-cv-02202

Dear Judge Cronan:

We represent Valley Forge Insurance Company (“Valley Forge”) in the above action. We are writing in connection with Valley Forge’s Notice of Removal, which was filed on Friday, March 12, 2021 (ECF Doc. No. 1). As part of the filing, a confidential attorney-client communication was inadvertently attached as page 2 of 4 of Exhibit 3 (ECF Doc. 1-3). We understand that the Help Desk at the Southern District has sealed Exhibit 3 in its entirety, and that Your Honor has been advised of this error.

In light of the confidential nature of the communication, we are respectfully requesting that the Court Order that document Doc. 1-3 remain sealed, and a corrected Document 1-3 be substituted in its place. A corrected version of Exhibit 3 is attached for that purpose.

We appreciate the Court’s assistance with this matter. If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,



Attachment